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July 11, 1996

William F. Caton, Acting Secretary
Federal Communications Commission
Washington, D.C. 20554

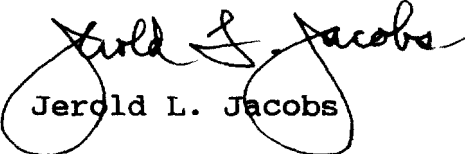
Re: **MM Docket No. 87-268**
Advance Television Systems

Dear Mr. Caton:

On behalf of our client, Island Broadcasting Co., transmitted herewith for filing are an original and nine (9) copies of its **"Comments of Island Broadcasting Co."** in response to the **Fifth Further Notice of Proposed Rule Making** in the above-referenced Docket.

Please direct any communications or inquiries concerning this matter to the undersigned.

Very truly yours,


Jerold L. Jacobs

Enc.

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cc: Keith A. Larson, Assistant Chief
Saul Shapiro
Roger Holberg
Robert Eckert (All FCC - By Hand)(All w/enc.)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

TO: The Commission

COMMENTS OF ISLAND BROADCASTING CO.

ISLAND BROADCASTING CO. ("Island"), licensee of Low Power Television ("LPTV") Stations WXNY-LP, Long Island City, New York, WNYX-LP, Plainview, Hicksville, and Mineola, New York, and WNXV-LP, Brownsville, New York, by its attorneys, pursuant to §1.415 of the Commission's Rules, hereby submits Comments on LPTV-related aspects of the Fifth Further Notice of Proposed Rule Making ("Fifth Further Notice"), FCC 96-207, released May 20, 1996. In support whereof, the following is shown:

I. INTRODUCTION

1. Island and its Technical Director, Richard D. Bogner, have previously filed comments in this Docket on several occasions, focusing on ATV allotment and assignment policy and methodology questions, especially as they relate to how the Commission can maximize the number of LPTV stations that will receive ATV (or, now, DTV) allotments in the forthcoming DTV Table of Allotments. Since 1985, Island has been providing a diverse array of live creative LPTV programming to ethnic and minority viewing audiences in the New York City metropolitan area and Long Island via what are now three LPTV stations. In addition, Mr. Bogner is well-known as a master designer and former manufacturer of broadcast antennas (the "Bogner" in Bogner Broadcast Equipment Corp.). He also has participated in Commission

rulemaking and broadcast application proceedings and in broadcast trade association advisory groups for many years. Island's Comments herein reflect a combination of its practical experience as an LPTV licensee and of Mr. Bogner's extensive technical involvement with the entire broadcast spectrum. Moreover, consistent with previous Commission policy pronouncements, Island takes seriously, and unabashedly supports, the Commission's efforts to "save LPTV," even as it marches forward in this proceeding with primary focus on full power television's transition to DTV

II. TEN COMMANDMENTS OF INTERFERENCE MINIMIZATION

2. It is apparent that there is much that the Commission can do, when developing a DTV Table of Allotments, to prevent unnecessary elimination of LPTV channels due to adjacent channel interference. This "interference" issue is specifically referenced in Paragraphs 53 - 59 of the Fifth Further Notice, and comments were requested. If the Commission really wants to help maintain the LPTV Service, Island recommends that the Commission should adopt the following "Ten Commandments" of interference minimization, all parts of which will help both full power and LPTV stations considerably:

- | | |
|-------|---|
| ONE | Permit LPTV licensees to frequency track ATV adjacent channels, even if this results in excessive deviation of offset, as long as no viewer complaints are received. |
| TWO | Continue to permit LPTV licensees to increase their aural power. |
| THREE | Require highly linear TV transmitters to minimize intermodulation products, which several manufacturers claim they can do. |
| FOUR | Locate the ATSC DTV Standard station pilot frequency 5.082138 MHz above the visual carrier of the lower adjacent channel NTSC station, as proposed in Paragraph 57 of the <u>Fifth Further Notice</u> . Require precision offset between the DTV pilot frequency and the NTSC color subcarrier. |

- FIVE** **Permit licensed LPTV stations to increase their transmitter output power ("TPO") above 1 kilowatt if it is impractical to increase antenna gain, as long as the Commission's interference criteria are met.**
- SIX** **Permit LPTV licensees to move toward collocation with adjacent channel DTV stations via minor modifications of their LPTV licenses.**
- SEVEN** **Require TV receiver designs which will maximize protection to adjacent NTSC channels from DTV channels.**
- EIGHT** **Require emission mask to minimize out of band emissions, with the specific goal of protecting LPTV NTSC stations.**
- NINE** **Keep the maximum effective radiated power ("ERP") of DTV stations, and the authorized value in each case, to a minimum consistent with required station contour coverage.**
- TEN** **Do whatever else can be done in practice to protect LPTV licensees adjacent to DTV channels, including use of filters.**

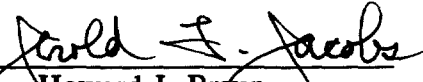
III. CONCLUSION

3. Island urges that it will cost the Commission and full power TV stations almost nothing to implement the above Ten Commandments and other similar measures to protect adjacent channel LPTV stations. However, Island submits that the result will undoubtedly be the saving of many licensed LPTV stations, which otherwise would be permanently displaced by the DTV Table of Allotments and forced to cease operations. Such a development would be devastating to the LPTV Service and to its audiences, is contrary to the paramount public interest, and, most importantly, is totally unnecessary. The Commission continues to receive evidence that the LPTV Service is making an invaluable contribution to local community television. This "noble experiment" is less than 20 years old. It deserves the Commission's maximum efforts to minimize adjacent channel interference to licensed LPTV stations as the Commission develops a DTV Table of Allotments and related technical criteria for amending

that Table with additional DTV allotments in the future (Fifth Further Notice, ¶55).

Respectfully submitted,

ISLAND BROADCASTING CO.

By 
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Dated: July 11, 1996